

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

CONSUMER FINANCIAL PROTECTION
BUREAU,

Plaintiff,

v.

RICHARD F. MOSELEY, SR., et al.,

Defendants.

**CASE NO. 4:14-00789-CV-W-
DW**

**PLAINTIFF'S *EX PARTE* APPLICATION FOR A TEMPORARY
RESTRAINING ORDER WITH ASSET FREEZE, APPOINTMENT OF A
RECEIVER AND OTHER EQUITABLE RELIEF AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

(FILED UNDER SEAL)

Plaintiff, Consumer Financial Protection Bureau ("Bureau"), having filed its Complaint in this matter for a permanent injunction and other relief, including restitution for consumers injured by Defendants' unlawful practices in violation of Sections 1031(a) and 1036(a) of the Consumer Financial Protection Act, 12 U.S.C. §§ 5531(a) and 5536(a), the Truth in Lending Act, 15 U.S.C. §§ 1601-1666j, and its implementing Regulation Z, 12 C.F.R. § 1026, and the Electronic Funds Transfer Act, 15 U.S.C. § 1693, and its implementing Regulation E, 12 C.F.R. § 1005.10, files this *ex parte* application for a temporary restraining order with asset freeze, appointment of a receiver, immediate access to Defendants' business premises, limited expedited discovery, and other equitable relief, and for an order to show cause why a preliminary injunction should not issue. A proposed temporary restraining order, including an order

to show cause, has been filed concurrently. This Court is authorized to grant such relief by Sections 1054(a) and 1055(a) of the CFPA, 12 U.S.C. §§ 5564(a) and 5565(a), and Federal Rule of Civil Procedure 65(a).

The Bureau separately files its Suggestions in Support of its Application for a Temporary Restraining Order with Asset Freeze, Appointment of a Receiver and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should not Issue.

Dated: September 9, 2014

Respectfully submitted,

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